

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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Charles H. Cooper,	:	
Jr.,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	Case No. 2:20-cv-3332
	:	Judge Michael H. Watson
Longwood Forest	:	Magistrate Judge Jolson
Products, Inc.,	:	
et al.,	:	
	:	
Defendants.	:	

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DEPOSITION OF TERA NAREE PAULINE DEAN  
VIA VIDEOCONFERENCE

- - - - -

Taken at Dean residence  
Elyria, OH 44035  
January 13, 2021, 10:02 a.m.

- - - - -

Spectrum Reporting LLC  
400 South Fifth Street, Ste. 201  
Columbus, Ohio 43215  
614-444-1000 or 800-635-9071  
www.spectrumreporting.com

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Exhibit A

A P P E A R A N C E S

ON BEHALF OF PLAINTIFF:

Law Office of Daniel R. Mordarski LLC  
5 East Long Street, Suite 1100  
Columbus, OH 43215  
By Daniel R. Mordarski, Esq.  
(Via videoconference)

and

C. Steven Rabold Co., LPA  
6061 S. Broadway Avenue  
Lorain, OH 44053  
By C. Steven Rabold, Esq.  
(Via videoconference)

ON BEHALF OF DEFENDANTS:

Lane, Alton & Horst LLC  
Two Miranova Place, Ste. 220  
Columbus, OH 43215  
By Edward G. Hubbard, Esq.  
(Via videoconference)  
Joseph Gerling, Esq.  
(Via videoconference)

1 youngest, would not have been there. Other than  
2 children that you described and [REDACTED], is there  
3 anybody else that would have lived in Columbus  
4 with you?

5 A. Besides their father Jerry, no.

6 Q. Okay. Did Mr. Boone live at that  
7 address in Columbus?

8 A. He was staying with me, yes.

9 Q. Okay. Was he on the lease?

10 A. No.

11 Q. Okay. Did he stay there throughout the  
12 length of your lease term?

13 A. No. He had actually just came -- he  
14 lost his apartment, so he was looking for a new  
15 apartment. So I was letting him stay there.

16 Q. Okay. When did he lose his apartment  
17 and move into the address in Columbus?

18 A. I'll say about -- right in April.

19 Q. Okay. April of 2018?

20 A. 2018, yes.

21 Q. I'm sorry. Did you say '19 or '18?

22 A. 2018.

23 Q. Okay. Where does Mr. Boone live today?

24 A. Mr. Boone resides in Elyria also.

1 to the bed rail?

2 A. It was attached just like this, both  
3 hooks were attached to that wooden piece and I  
4 just lifted it up and removed it.

5 Q. Okay. Let me rephrase the question.  
6 Were the hooks attached in any way to the bed rail  
7 that you would be required to loosen before you  
8 would take the ladder off?

9 A. Oh, no. They were never attached.  
10 They were just -- it was like a removable ladder.

11 Q. And would you remove it in other  
12 circumstances such as vacuuming the floor or -- I  
13 mean, that's the scenario that comes to my mind.  
14 But for any other purpose?

15 A. No, sir. That was the only time I did  
16 remove it. Excuse me.

17 Q. At any time when the kids were in the  
18 room and either on the bed or around the bed, did  
19 you take any pictures of them?

20 A. No.

21 Q. So before this incident, is it fair to  
22 say you never took any pictures where the bunk bed  
23 was in the picture?

24 A. Yeah.

1 Q. And from the pictures, it appears that  
2 there is a fairly deep shag carpet in the bedroom;  
3 is that correct?

4 A. Uh-huh. Yes.

5 Q. Are you aware of any incidents where  
6 the ladder ever slipped out because the bottom  
7 rails of the ladder slipped on the carpet?

8 A. No. Actually, the carpet kind of gave  
9 it the security for it to stay in place.

10 Q. How many times had you removed the  
11 ladder from the top rail?

12 A. One time.

13 Q. Okay. I want to talk about the  
14 incident on May 22nd, 2018. My understanding it  
15 was around 3:00; is that correct?

16 A. Correct.

17 Q. Okay. What had been going on that day  
18 around the house?

19 A. Woke up, started my day off normal.  
20 Got the kids dressed. Got my oldest off to the  
21 bus. Fed them cereal. We went out, went to the  
22 mall. I got my eyebrows done. We walked around.  
23 We left. I took them to Burger King to receive  
24 lunch. Came back home, they sat down, they ate

1 lunch. Jerry was just leaving out to go to his  
2 probation officer or counseling or something. I'm  
3 not sure. And he had just left and the kids were  
4 -- after they got done eating lunch, they asked to  
5 go outside and play. But I was kind of exhausted  
6 from being up early that morning, and I told them  
7 that they can play upstairs for a little bit, we  
8 weren't going outside. I went to the restroom  
9 downstairs, my master restroom that was connected  
10 to my bedroom. [REDACTED] and [REDACTED] went  
11 upstairs to play.

12 I was in my restroom using the  
13 bathroom, a No. 2, smoking my cigar and looking  
14 through my phone. And not even five minutes later  
15 my son [REDACTED] came downstairs and says, Mommy,  
16 come, come now. And something came over me and I  
17 ran upstairs. And [REDACTED] was hanging in the  
18 ladder and he was turning purple. He wasn't  
19 responsive. So I tried to pull him out the ladder  
20 forward and I couldn't do it. So I went behind  
21 and took him from behind the ladder from his legs  
22 and I had to pull him out that way. I struggled  
23 to get him out.

24 But when I finally got him out of